

TRACY R. TURNER,)
)
Plaintiff,)
)
)
)
-vs-) Case No. 3:21-CV-00042
)
) Judge Eli J. Richardson
METROPOLITAN GOVERNMENT OF)
NASHVILLE AND DAVIDSON)
COUNTY,)
)
Defendant.)

Come now Tracy Turner and the Metropolitan Government of Nashville and Davidson County, Tennessee, by and through their respective counsel of record, and respectfully request that this case be reinstated to the active case docket and a new jury trial date be assigned.¹ As grounds for this Joint Motion, counsel would state that during a mediation on January 16, 2024, the parties were able to come to a settlement of all claims presented in this action. This settlement was subject to the Metropolitan Council adopting a resolution approving the terms of the settlement. At its meeting on March 7, 2024, the

¹ Lead counsel for the Metropolitan Government will be in trial in a different federal matter beginning June 25, 2024. Her co-counsel in this case also has a prescheduled vacation during the third week of June. To avoid conflicts with these dates and to provide counsel with adequate time to prepare for both trials, the Metropolitan Government requests that the trial in this case be set on a date *other than* June 11, 18, or 24, and July 2 or 9.

Metropolitan Council voted down the resolution approving the agreed upon settlement between the parties.

WHEREFORE, the parties request that this case be restored to active status, and that a new jury trial date be assigned, as well as any further orders the Court deems necessary.

Respectfully submitted,

CRAIN LAW GROUP, PLLC

By:

/s/ Larry L. Crain

Larry L. Crain, Tenn.Sup. Ct. # 9040

Emily Castro

CRAIN LAW GROUP, PLLC

5214 Maryland Way, Suite 402

Brentwood, TN 37027

(615) 376-2600

Larry@Crainlaw.legal

Attorneys for the Plaintiff

/s/ Allison L. Bussell

Allison L. Bussell

John W. Ayers

Department of Law for the

Metropolitan Government of Nashville

and Davidson County

Metropolitan Courthouse, Suite 108

P. O. Box 196300

Nashville, TN 37219

allison.bussell@nashville.gov

will.ayers@nashville.gov

Counsel for the Defendant